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15 UNITED STATES DISTRICT COURT

16 DISTRICT OF NEVADA

17 DONALD TAYLOR,

18 Case No. 2:20-cv-01962-GMN-DJA

19 Petitioner,

20 UNOPPOSED MOTION FOR  
21 ENLARGEMENT OF TIME TO FILE  
22 REPLY IN SUPPORT OF MOTION TO  
23 DISMISS (ECF NO. 51)

24 vs.

25 DIRECTOR, NDOC, *et al.*,

26 (FIRST REQUEST)

27 Respondent(s).

28  
16 Respondents move this Court for an enlargement of time of 45 days from the current due date of  
17 November 7, 2022, up to and including December 22, 2022, in which to file their Reply in Support of  
18 their Motion to Dismiss (ECF No. 51). This Motion is made pursuant to Fed. R. Civ. P. 6(b) and Rule 6-  
19 1 of the Local Rules of Practice and is based upon the attached declaration of counsel.

20 This is the first enlargement of time sought by Respondents, and the request is brought in good  
21 faith and not for the purpose of delay.

22 DATED: November 7, 2022.

23 Submitted by:

24 AARON D. FORD  
25 Attorney General

26 By: /s/ Jaimie Stilz  
27 Jaimie Stilz (Bar. No. 13772)  
28 Deputy Attorney General

## **DECLARATION OF JAIME STILZ**

I, JAIME STILZ, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada, and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I am assigned to represent Respondents in *Donald Taylor v. Director, NDOC, et al.*, Case No. 2:20-cv-01962-GMN-DJA, and as such, have personal knowledge of the matters contained herein.

2. This is my first request for an extension to file the Reply in Support of the Motion to Dismiss, and this Motion is made in good faith and not for the purpose of delay.

3. The Reply in Support of the Motion to Dismiss (ECF No. 51) is currently due on November 7, 2022.

4. I am unable with due diligence to timely complete the Reply herein. I have been out on medical leave and anticipate being out for additional days, as I am attempting to manage significant ongoing medical issues. Moreover, I anticipate being out of the office for a number of upcoming holiday/planned leave days. I also have two separate upcoming Ninth Circuit oral arguments. I have been diligently striving to resolve and/or work around these issues but they have significantly impacted my ability to complete the Reply in a timely fashion, thus necessitating an extension.

5. In seeking this extension, I am taking into consideration additional obligations and deadlines for both myself and my supervising senior colleague.

6. I have spoken to counsel for Taylor, and she does not oppose this request.

7. Based on the foregoing, I respectfully request an enlargement of time of 45 days, up to and including December 22, 2022, to file the Reply in Support of the Motion to Dismiss (ECF No. 51).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 7th day of November, 2022.

## **IT IS SO ORDERED.**

/s/ Jamie Stilz  
Jamie Stilz (Bar No. 13772)  
Deputy Attorney General

Dated this 9 day of November, 2022

Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT

1                   CERTIFICATE OF SERVICE

2                   I hereby certify that I am an employee of the Office of the Nevada Attorney General and that on  
3 this 7th day of November, 2022, I served a copy of the foregoing *Unopposed Motion for Enlargement of*  
4 *Time to File Reply in Support of Motion to Dismiss (ECF No. 51)*, by U.S. District Court CM/ECF  
5 electronic filing, to:

6                   Alicia R. Intriago  
7                   Assistant Federal Public Defender  
8                   411 E. Bonneville Ave., Ste. 250  
9                   Las Vegas, Nevada 89101  
10                  (702) 388-6577  
11                  Alicia\_Intriago@fd.org

12                  \_\_\_\_\_  
13                  /s/ C. Martinez  
14                  An employee of the Office of the Attorney General

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